

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NORTH AMERICAN KARAOKE-WORKS  
TRADE ASSOCIATION, INC.

Plaintiff and Counterclaim Defendant,

v.

ENTRAL GROUP INTERNATIONAL, LLC,

Defendant and Counterclaim Plaintiff,

v.

SAM CHAN and RAY YIM,

Counterclaim Defendants.

Case No. 06-CV-5158 (LTS)(MHD)

**DECLARATION OF ROBERT E. HANLON IN SUPPORT OF  
DEFENDANT AND COUNTERCLAIM PLAINTIFF'S REQUEST FOR  
DEFAULT JUDGMENT, PERMANENT INJUNCTION AND IMPOUNDMENT**

ROBERT E. HANLON, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury:

1. I am a partner in the law firm of Alston & Bird LLP ("A&B") and am a member in good standing of the Bars of the States of New York and New Jersey, the United States District Courts for the Southern and Eastern Districts of New York and the Districts of New Jersey and Arizona, the United States Courts of Appeals for the First and Second Circuit and the United States Supreme Court. I am familiar with the facts and circumstances in this action.

2. My firm and I presently serve as counsel to Entral Group International, LLC ("EGI"), Defendant and Counterclaim Plaintiff in this action.

3. Attached as Exhibit A is the Affidavit of Robert Sanderson of Audio Video Forensic Lab dated August 8, 2007.

4. Attached hereto are true and accurate copies of the following:
- a. Exhibit B – Excerpts from the Deposition of Sam Chan at 67:8-75:7;  
Excerpts from the Deposition of Ray Yim at 158:3-22.
  - b. Exhibit C – Excerpts from the Deposition of Ray Yim at 82:21-84:11;  
Excerpts from the Deposition of Sam Chan at 66:12-70:5.
  - c. Exhibit D – Excerpts from the Deposition of Sam Chan at 110: 21-25;  
111:2-6.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
August 10, 2007

/s/ Robert E. Hanlon

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Robert E. Hanlon, Esq.